

March 22, 2001

VIA ELECTRONIC FILING

Federal Communications Commission
International Bureau
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application of Piedmont Communications Services, Inc.
for Authorization under Section 214 of the Communications
Act of 1934, as amended, to Resell International
Switched Telecommunications Services

Attn: Chief, International Facilities Division
Common Carrier Bureau

Enclosed is the electronic Application of Piedmont Communications Services, Inc. for Authorization under Section 214 of the Communications Act of 1934, as amended, to resell international switched telecommunications services. The required FCC Form 159 and a check payable to the Federal Communications Commission in the amount of \$815.00 to cover the required filing fee have been sent to the Federal Communications Commission c/o Mellon Bank in Pittsburgh, Pennsylvania.

Please contact the undersigned should there be any questions concerning this matter.

Sincerely,

John Becci
Manager – Regulatory Affairs

Enclosures

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Application of)	
)	
Piedmont Communications Services, Inc.)	File No. _____
)	
For authorization under Section 214)	
of the Communications Act of 1934,)	
as amended, to resell international)	
switched telecommunications services.)	

To: Chief, International Facilities Division

SECTION 214 APPLICATION

Piedmont Communications Services, Inc. ("Applicant") hereby seeks authorization to provide international switched telephone service through the resale of existing international switched telecommunications services. In support of this request, the following information is provided, as required by Section 63.18 of the Commission's Rules:

- a) Name and address of applicant:

Piedmont Communications Services, Inc.
191 Reeds Baptist Church Road
P.O. Box 2066
Lexington, NC 27293-2066
Telephone Number: (336) 787-5433
Facsimile: (336) 787-5246

- b) State law under which applicant is organized:

North Carolina

- c) Correspondence concerning this application should be addressed to:

Mr. Elbert R. Perrell
Executive Vice President
Piedmont Communications Services, Inc.
191 Reeds Baptist Church Road
P.O. Box 2066
Lexington, NC 27293-2066
Telephone Number: (336) 787-5433
Facsimile: (336) 787-5246

with a copy to:

John Becci
Manager - Regulatory Affairs
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, Maryland 20706
Telephone Number: (301) 459-7590

- d) Applicant is currently not fully subject to the Act and has not previously received authority under Section 214 of the Act. Applicant also plans to offer interstate, domestic long distance resale services.
- e) Applicant requests Section 214 authority to operate as a resale carrier pursuant to the terms and conditions of 47 C.F.R. Section 63.18(e)(2).
- f) File separate applications:

Not applicable. See Section e), supra.
- g) Applicant seeking authority under 63.18(e)(6):

Not applicable. See Section e), supra.

- h) Applicant hereby certifies that it has no affiliation with a foreign carrier or U. S. Carrier whose facilities-based services shall be resold by Applicant within the meaning of 47 C.F.R. Sections 63.18(h)(1) and 63.18(h)(3), respectively. In accordance with 47 C.F.R. Section 63.18(h)(2), the following information is provided: 100% of Applicant's issued and outstanding stock is owned by Applicant's parent, Piedmont Telephone Membership Corporation, a U.S. Corporation. Neither the applicant nor the Piedmont Telephone Membership Corporation has any stockholders who own 10% or more of the stock. Piedmont Telephone Membership Corporation's principal business is the provision of telecommunications services to customers in and around, Lexington, North Carolina. Piedmont Telephone Membership Corporation's address is 191 Reeds Baptist Church Road, Lexington, North Carolina 27293.
- i) Applicant hereby certifies that the applicant has not agreed to accept special concessions directly or indirectly from any foreign carrier within the meaning of 47 C.F.R. Section 63.18(i)(1).
- j) Applicant hereby certifies that, to the best of its knowledge, information and belief, neither the Applicant nor any party to this Application has been convicted of drug possession or trafficking, such that Applicant is subject to a denial of federal radio licenses under Section 5301 of the Anti-Drug Abuse Act of 1988.
- k) Applicant desires streamlined processing within the meaning of 47 C.F.R. Section 63.12. Applicant hereby certifies that it has no affiliation with a foreign carrier or U.S. Carrier whose facilities-based services shall be resold by Applicant. Furthermore, Applicant certifies that it is not seeking authority to provide switched basic services over private lines to a country for which the Federal Communications Commission has not previously authorized the provision of switched services over private lines.

Since the applicant is a wholly owned subsidiary of Piedmont Telephone Membership Corporation, a local exchange telephone company, the following information is also being provided:

- 1) The parent company and the resale applicant will keep separate books of account.
- 2) The parent company and resale applicant will use joint switching facilities when cost effective and appropriate.
- 3) Any tariff services that resale applicant purchases from parent company will be purchased out of parent company's General Services Tariff.
- 4) The parent company will treat the resale applicant as a non-regulated affiliate for accounting purposes.

Respectfully submitted,

Piedmont Communications Services, Inc.

Elbert R. Perrell
Executive Vice President

Dated: _____

CERTIFICATE OF SERVICE

I, Christine Duncan, do hereby certify that on this 22nd Day of March 2001, a copy of the foregoing Section 214 application of Piedmont Communications Services, Inc. was mailed, first class postage prepaid, to the persons listed below:

The Honorable James B. Hunt, Jr.
Governor of the State of North Carolina
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Secretary of State
2201 C Street, N.W.
Washington, D.C. 20590